

1. Plaintiffs amended their complaint, asserting federal claims. The Superior Court for the State of Alaska granted Plaintiffs' motion to amend and accepted the amended complaint for filing on July 25, 2019.

2. In their Amended Complaint, paragraphs 77 through 89, Plaintiffs Fernando Ospina and Traci Reedy allege that Defendants deprived them of constitutional rights guaranteed under the 4th amendment, 5th amendment, and 14th amendment of the United States Constitution in violation of the Civil Rights Act of 1871, and 42 U.S.C. § 1983. The action therefore arises under the Constitution, laws, or treaties of the United States.

3. The action is one over which this court has original jurisdiction under the provisions of 28 U.S.C. § 1331, and is one which may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441 in that it is a civil action arising under the Constitution, laws, or treaties of the United States.

4. This Notice of Removal is being filed within thirty days after the court accepted the amended complaint and it was first ascertained that the case is one which has become removable, and is therefore timely filed under 28 U.S.C. 1446(b).

5. All of the defendants consent to removal under 42 U.S.C. § 1446(b)(2)(C).

6. Written notice of the filing of this Notice will promptly be given to all adverse parties as required by 28 U.S.C. § 1446(d).

7. A Notice to State Court of Removal will be filed in the Superior Court for the State of Alaska, Third Judicial District at Kenai, Case No. 3KN-18-01084 CI, on behalf of the defendants.

DATED: August 19, 2019.

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Certificate of Service

I certify that on August 19, 2019 the foregoing **Defendants' Joint Notice of Removal** was served electronically on:

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Ospina, F. & Reedy, T. (v. SOA, DPS & Wertanen, M)
Defendants' Joint Notice of Removal

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